

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	Criminal No.	23cr10202
)		
v.)	Violations:	
)		
LINDSAY GROVES and)	<u>Counts One through Three:</u> Sexual Exploitation	
STACIE MARIE LAUGHTON,)	of Children; Aiding and Abetting	
)	(18 U.S.C. §§ 2251(a) and (e) and 2)	
)		
Defendants)	<u>Count Four:</u> Distribution of Child Pornography	
)	(18 U.S.C. §§ 2252A(a)(2)(A) and (b)(1))	
)		
)	<u>Forfeiture Allegation:</u>	
)	(18 U.S.C. § 2253)	
)		

INDICTMENT

COUNT ONE

Sexual Exploitation of Children; Aiding and Abetting
(18 U.S.C. §§ 2251(a) and (e) and 2)

The Grand Jury charges:

On various dates between on or about June 13, 2023 and on or about June 16, 2023, in the District of Massachusetts, and elsewhere, the defendants,

LINDSAY GROVES and
STACIE MARIE LAUGHTON,

employed, used, persuaded, induced, enticed, and coerced a minor, “Minor 1” (YOB 2019), to engage in any sexually explicit conduct for the purpose of producing any visual depiction of such conduct, and attempted to do so, and knew and had reason to know that such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, and the visual depiction was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce, by any means, including by computer, and the visual

depiction was actually transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce.

All in violation of Title 18, United States Code, Sections 2251(a) and (e) and 2.

COUNT TWO

Sexual Exploitation of Children; Aiding and Abetting
(18 U.S.C. §§ 2251(a) and (e) and 2)

The Grand Jury further charges:

On or about June 13, 2023, in the District of Massachusetts, and elsewhere, the defendants,

LINDSAY GROVES and
STACIE MARIE LAUGHTON,

employed, used, persuaded, induced, enticed, and coerced a minor, “Minor 2” (YOB 2019), to engage in any sexually explicit conduct for the purpose of producing any visual depiction of such conduct, and attempted to do so, and knew and had reason to know that such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, and the visual depiction was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce, by any means, including by computer, and the visual depiction was actually transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce.

All in violation of Title 18, United States Code, Sections 2251(a) and (e) and 2.

COUNT THREE

Sexual Exploitation of Children; Aiding and Abetting
(18 U.S.C. §§ 2251(a) and (e) and 2)

The Grand Jury further charges:

On or about June 14, 2023, in the District of Massachusetts, and elsewhere, the defendants,

LINDSAY GROVES and
STACIE MARIE LAUGHTON,

employed, used, persuaded, induced, enticed, and coerced a minor, “Minor 3” (YOB 2020), to engage in any sexually explicit conduct for the purpose of producing any visual depiction of such conduct, and attempted to do so, and knew and had reason to know that such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, and the visual depiction was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce, by any means, including by computer, and the visual depiction was actually transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce.

All in violation of Title 18, United States Code, Sections 2251(a) and (e) and 2.

COUNT FOUR
Distribution of Child Pornography
(18 U.S.C. §§ 2252A(a)(2)(A) and (b)(1))

The Grand Jury further charges:

From on or about June 13, 2023 through June 16, 2023, in the District of Massachusetts and elsewhere, the defendant,

LINDSAY GROVES,

knowingly distributed any child pornography, as defined in Title 18, United States Code, Section 2256(8), that had been mailed, and using any means and facility of interstate and foreign commerce shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.

All in violation of Title 18, United States Code, Sections 2252A(a)(2)(A) and (b)(1).

CHILD PORNOGRAPHY/CHILD EXPLOITATION FORFEITURE ALLEGATION
(18 U.S.C. § 2253)

1. Upon conviction of one or more of the offenses in violation of Title 18, United States Code, Sections 2251 and 2252A, set forth in Counts One through Four, the defendants,

LINDSAY GROVES and
STACIE MARIE LAUGHTON,

shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 2253, (i) any visual depiction described in sections 2251, 2251A, 2252, 2252A, 2252B, or 2260 of Chapter 110 of Title 18, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received in violation of Chapter 110 of Title 18; (ii) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offenses; and (iii) any property, real or personal, used or intended to be used to commit or to promote the commission of such offenses or any property traceable to such property. The property to be forfeited includes, but is not limited to, the following:

- a. One (1) Apple iPhone with serial number QJMXR6G45V seized from GROVES on June 21, 2023; and
- b. One (1) Apple iPad with serial number DMPXM4ZVJF89 seized from GROVES on June 21, 2023; and
- c. One (1) Apple iPhone 12 Pro Max with serial number HH5KH0AG0D42 seized from LAUGHTON on June 22, 2023.

2. If any of the property described in Paragraph 1, above, as being forfeitable pursuant to Title 18, United States Code, Section 2253, as a result of any act or omission of the defendant—

- a. cannot be located upon the exercise of due diligence;


- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States of America, pursuant to Title 18, United States Code, Section 2253(b), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the property described in Paragraph 1 above.

All pursuant to Title 18, United States Code, Section 2253.

A TRUE BILL


FOREPERSON



Anne Paruti
Jessica L. Soto
ASSISTANT UNITED STATES ATTORNEYS
DISTRICT OF MASSACHUSETTS

District of Massachusetts: JULY 27, 2023
Returned into the District Court by the Grand Jurors and filed.

/s/ Noreen A. Russo

DEPUTY CLERK at 12:29 PM

